KRASKIN. LESSE & COSSON. LLP ATTORNEYS AT LAW

TELECOMMUNICATIONS MANAGEMENT CONSULTANTS

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November 16, 1999

Magalie Roman Salas Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

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TORREST COMMISSION WHITE OF THE SECRETARY

The Independent Telephone Companies Re:

CC Docket No. 98-170

Petition for Temporary, Limited Waiver

Filed November 10, 1999

Dear Ms. Salas:

On behalf of Sledge Telephone Company and Lakeside Telephone Company, Inc., we are transmitting the Declarations of Robert O. Sledge bearing an original signature. On November 10, 1999, the referenced Petition was filed with the Declarations bearing facsimile signatures.

Please associate the Declarations with the captioned Petition.

Should you have any questions, please contact this office.

Very truly yours,

Margaret Nyland

Attachments

No. of Copies rec'd List ABCDE

LAKESIDE TELEPHONE COMPANY, INC.

Lakeside Telephone Company, Inc. (the "Company") provides exchange and exchange access services to approximately 400 lines in Mississippi. The Company is a member of the United States Telecom Association ("USTA") and is a rural telephone company under the Communications Act of 1934 as amended. The Company utilizes Communications Data Group ("CDG") for the provision of billing software and uses Illluminet as its clearinghouse for casual calling and alternate service provider billing and collection arrangements. The Company is concentrating its efforts on Year 2000 issues. In June, 1999, the Company contacted CDG with respect to the FCC's Truth-in-Billing ("TIB") requirements. CDG informed the Company by memorandum dated November 3, 1999, that it will not be capable of providing the necessary software updates required to comply with the TIB inquiry contact and separate provider requirements at this time. Specifically, the need for this waiver arises in light of the fact that the Company currently provides billing and collection services for casual calling and alternate service providers and that the Company is not yet capable of listing inquiry contacts on bills for these providers. In addition, this waiver is necessary because the non-recurring charges and credits for the carriers for which the Company provides 1+ billing and collection services currently are aggregated with other non-recurring charges and credits in the local service section of the Company's bill, and the Company is not yet capable of separating these credits and charges by service provider. Accordingly, the Company requests that these TIB requirements be extended to April 1, 2000, the date that certain other TIB rule requirements are to be effective. The Company will, however, engage in proper testing and will continue to work with its clearinghouse and software vendor to coordinate the resolution of this issue. Until the requested waiver expires, the Company will continue to provide its contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

DECLARATION OF ROBERT O. SLEDGE

I, Robert O. Sledge, President of Lakeside Telephone Company, Inc. ("Lakeside") do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver," and the information contained therein describes the status of Lakeside's TIB compliance and is true and accurate to the best of my knowledge, information, and belief.

Date 11/4/99

Robert O. Sledge

President

05:08PM

SLEDGE TELEPHONE COMPANY

Sledge Telephone Company (the "Company") provides exchange and exchange access services to approximately 600 lines in Mississippi. The Company is a member of the United States Telecom Association ("USTA") and is a rural telephone company under the Communications Act of 1934 as amended. The Company utilizes Communications Data Group ("CDG") for the provision of billing software and uses Illuminet as its clearinghouse for casual calling and alternate service provider billing and collection arrangements. The Company is concentrating its efforts on Year 2000 issues. In June, 1999, the Company contacted CDG with respect to the FCC's Truth-in-Billing ("TIB") requirements. CDG informed the Company by memorandum dated November 3, 1999, that it will not be capable of providing the necessary software updates required to comply with the TIB inquiry contact and separate provider requirements at this time. Specifically, the need for this waiver arises in light of the fact that the Company currently provides billing and collection services for casual calling and alternate service providers and that the Company is not yet capable of listing inquiry contacts on bills for these providers. In addition, this waiver is necessary because the non-recurring charges and credits for the carriers for which the Company provides 1+ billing and collection services currently are aggregated with other non-recurring charges and credits in the local service section of the Company's bill, and the Company is not yet capable of separating these credits and charges by service provider. Accordingly, the Company requests that these TIB requirements be extended to April I, 2000, the date that certain other TIB rule requirements are to be effective. The Company will, however, engage in proper testing and will continue to work with its clearinghouse and software vendor to coordinate the resolution of this issue. Until the requested waiver expires, the Company will continue to provide its contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

DECLARATION OF ROBERT O. SLEDGE

I. Robert O. Sledge, President of Sledge Telephone Company ("Sledge") do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver," and the information contained therein describes the status of Sledge's TIB compliance and is true and accurate to the best of pay knowledge, information, and belief.

Date /1/9/99

Robert O. Sledge

President